



Department of Energy
Idaho Operations Office
1955 Freemont Avenue
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March 3, 2004

Nicholas Ceto, INEEL Project Manager
EPA Region 10
712 Swift Blvd., Suite 5
Richland, WA 99352

Daryl F. Koch, Acting Remediation Manager
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

SUBJECT: Notification that the Operable Unit 3-13, Group 2, Soils Under Buildings, Piping Evaluation Will Not Be Performed – (EM-ER-04-048)

Dear Mr. Ceto and Mr. Koch:

This letter documents our agreement not to perform the Operable Unit 3-13, Group 2, Soils Under Buildings, Piping Evaluation. As agreed during the weekly Project Manager call on Monday, March 1, 2004, this scope of work is being performed under the Waste Calcine Facility and the Group 4, Perched Water projects.

The piping evaluation, which was identified in the *Drainage Evaluation Plan for Group 2—Soils Under Buildings and Structures for Waste Area Group 3, Operable Unit 3-13* (DOE/ID-10759), was intended to determine whether recharge from leaking pipes near Group 2 sites could cause leaching of soil contaminants to exceed the groundwater remedial action objectives. Two studies have been recently completed that identified leaky pipes and water discharges at INTEC. These reports will be added to the Information Repository.

NE-ID feels the scope and the objectives for the piping evaluation will be met through these INTEC water studies:

Vicinity Discharges Elimination Work Plan for the HWMA/RCRA Post Closure Permit for the INTEC Waste Calcining Facility at the INEEL, DOE/NE-ID-11138, Rev. 0, February 2004. This study identified water discharges to the subsurface in the northern INTEC. These two water sources, near Group 2 sites, will be eliminated as part of the WCF post-closure monitoring activities this year.

INTEC Water System Engineering Study (WSES), DOE/ID-11115, Rev. 0, December 2003. This study performed a water balance at INTEC using existing metering in an attempt to identify leaky or suspect underground piping. No leaky or suspect piping was identified in the vicinity of Group 2 sites. Based upon the recommendations from this study, efforts are underway to improve the water metering capability at INTEC to (1) develop a quantitative water balance for the facility and (2) identify potential leaky piping systems that may impact the perched groundwater. If this effort

identifies leaky pipes in the vicinity of Group 2 sites, they will be evaluated with respect to impact upon the groundwater remedial action objectives. This study will be performed for two years and NE-ID will transmit a Phase II WSES Report with the results to you in March 2006.

In the southern portion of INTEC, the single Group 2 site (CPP-02) lies directly beneath the dry fuel storage area at CPP-603. Since there is not active piping beneath the dry fuel storage area, there is not a potential source of recharge to the aquifer that could impact the groundwater remedial action objectives.

The final determination of possible leaching impacts will be provided to you when the Phase II WSES Report is sent in 2006. This change in approach does not impact any upcoming decisions.

If you have questions or need additional information, please contact Rachel Hall at (208) 526-1661.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen E. Hain".

Kathleen E. Hain, Project Manager
Environmental Restoration Program

cc: M. English, IDHW, DEQ, 1410 N. Hilton, Boise, ID 83706
R. Cummings, DOE-HQ, EM 441

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CONCURRENCE: N/A

R. Hall (EM/ER), MS 1222
K. Hain (EM/ER), MS 1222
W. Leake (EM), MS 1222
J. Cooper (INTEC), MS 1154
F. Holmes (INTEC), MS 1154

RECORD NOTES:

1. This letter documents NE-ID's agreement with the State and EPA not to perform the Operable Unit 3-13, Group 2, Soils Under Buildings, Piping Evaluation. As we agreed on the weekly Project Manager call on Monday, March 1, 2004, this scope of work has essentially been performed under the Waste Calcine Facility and the Group 4, Perched Water projects.
2. R. Hall prepared this letter for K. Hain's signature.
3. This letter/memo closes CATS number N/A.
4. The attached correspondence has no relation to the Naval Nuclear Propulsion Program. Naval Reactors concurrence is not required.